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September 13, 2024

**Via ECF**

Hon. Edgardo Ramos  
United States District Court  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re:** *Revlon Consumer Products LLC, et al. v Give Back Beauty S.A., et al.*,  
Case No. 1:24-cv-06438-ER-RWL

Dear Judge Ramos:

We represent Plaintiffs Revlon Consumer Products LLC (“Revlon”) and Elizabeth Arden, Inc. (“Elizabeth Arden”) in this action alleging, *inter alia*, Defendants’ misappropriation of Plaintiffs’ trade secrets. We submit this letter in accordance with Your Honor’s Individual Rule 2.A in connection with a proposed motion for expedited discovery from Defendants.

Since September 3, 2024, counsel has met and conferred on multiple occasions by phone and through email, during which we requested, among other things, limited expedited discovery to enable Plaintiffs to identify the full scope of confidential information misappropriated by Defendants and how that information has been and is being used. To date, Defendants have declined to agree to any expedited discovery whatsoever, rejecting Plaintiffs’ requests for forensic analysis of its former employees’ electronic devices and return of Plaintiffs’ confidential information that the former employees took with them when they decamped to Give Back Beauty.

Today, Plaintiffs have filed a Motion for a Preliminary Injunction seeking an order directing the immediate return of all of Plaintiffs’ confidential information within Defendants’ possession, custody or control and enjoining Defendants from using or relying upon such information, among other relief. Plaintiffs’ proposed motion for expedited discovery is interrelated with its Motion for a Preliminary Injunction. Plaintiffs seek expedited discovery in further support of their Motion for Preliminary Injunction, to identify the full scope of trade secrets that have been stolen and the use that Defendants are making of those trade secrets. In addition, expedited discovery will enable Plaintiffs to understand the scope of, and attempt to

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mitigate, the irreparable harm identified in the Motion for a Preliminary Injunction. For this reason, Plaintiffs submit herewith as Exhibits 1 and 2, respectively, their proposed memorandum of law and supporting declaration of Michael Dockterman with exhibits. In lieu of a pre-motion conference, we ask that the Court accept the annexed motion papers as Plaintiffs' motion for expedited discovery and set an expedited return date for the motion.

Notwithstanding our request that the Court dispense with the requirement of a conference prior to the filing of this proposed motion for expedited discovery, we are available for a conference at the Court's convenience.

We thank the Court for its consideration of this request.

Respectfully submitted,

s/ Elyse D. Echtman

Elyse D. Echtman  
*Counsel for Plaintiffs*